

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In The Matter of	)	
	)	
Modernizing the E-rate	)	WC Docket No. 13-184
Program for Schools and Libraries	)	

**REPLY COMMENTS  
  
THE DIGITAL PROMISE LEAGUE OF INNOVATIVE SCHOOLS  
  
(THE LEAGUE)**

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## **REPLY COMMENTS OF DIGITAL PROMISE**

The Digital Promise League of Innovative Schools (the League), respectfully submits these Reply Comments in response to the initial comments filed pursuant to the July 23, 2013 Notice of Proposed Rulemaking (“NPRM”) in the above-captioned proceeding.<sup>1</sup>

As explained in its initial comments, the Digital Promise League of Innovative Schools strongly supports the President’s ConnectED Initiative and the Commission’s goal of improving education by expanding access to high-speed broadband. We urge the FCC to seize this opportunity to modernize E-Rate and ensure that all students have access to a high-quality, twenty-first century education.

Enabling every child to reach for their dreams means ensuring that our schools have high-speed educational opportunities. The comments received in this proceeding reflect nearly universal support for the League’s view that we need to modernize the E-rate program to meet the growing bandwidth needs of students, teachers, and schools.<sup>2</sup> Urgent action is necessary for providing America’s schools with the bandwidth necessary to take advantage of the transformational digital learning opportunities that are already apparent in the League’s own districts – from early childhood blended learning programs, to summer virtual academies to one-to-one learning to bring your own devices efforts.

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<sup>1</sup> The Digital Promise League of Innovative Schools (the League), is a national coalition of 40 public school districts that partner with entrepreneurs, researchers, and one another to demonstrate evaluate, and scale up innovations that deliver better results for students. The League districts serve over three million students in 24 states.

<sup>2</sup> Benton Foundation Comment at 6. See also West Virginia Department of Education Comment at 6; AT&T Comment at 1-2; Bureau of Indian Affairs/Bureau of Indian Education Comment at 2; Statement of Commissioner Jessica Rosenworcel at 2, Re: Modernizing the E-rate Program for Schools and Libraries, WC Docket No. 13-184; Qualcomm Comment at 5; American Library Association Comment at 2.

We agree with the experts that to enable students to take full advantage of digital learning, America's schools need an external connection of 100 Mbps per 1,000 students/staff or more of Internet access today and 1 Gbps per 1,000 students/staff by 2017. Further, they need an internal connection of 1 Gbps per 1,000 students/staff or more of Internet access today and 10 Gbps per 1,000 students/staff by 2017.<sup>3</sup> Today, however, too many of our children are trying to learn skills for tomorrow, without the speeds they need to succeed. As commenters explain, the average American school has about the same bandwidth as the average American home, even though they have on average 200 times as many users. It means that 72% of our schools do not have the Internet infrastructure they need to take advantage of digital learning opportunities today, and fewer than 1% have the infrastructure they will need in the future.<sup>4</sup> As a result, 40 million of our kids are being left behind without access to the broadband speeds they need to succeed. By setting meaningful threshold speed goals, we can help ensure that every student, regardless of where they live, the color of their skin, or the income of their community will have equal access to high speed educational opportunities.

We also need to extend high speed next generation infrastructure to every school, and high speed Wi-Fi to every classroom. As Commissioner Ajit Pai said in his statement at the launch of the E-rate modernization docket: "E-rate should be about funding next generation infrastructure that will facilitate digital learning..."<sup>5</sup> To meet the high-capacity digital learning needs of schools for today and tomorrow, commenters agree that schools must have access to a

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<sup>3</sup> SETDA Comment at 16; HP Comment at 9; Illinois Fiber Resources Group Comment at 2-3, and see SETDA, The Broadband Imperative: Recommendations to Address K-12 Education Infrastructure Needs (2012), available at [http://www.setda.org/c/document\\_library/get\\_file?folderId=353&name=DLFE-1517.pdf](http://www.setda.org/c/document_library/get_file?folderId=353&name=DLFE-1517.pdf) ("SETDA Broadband Recommendations").

<sup>4</sup> EducationSuperHighway comments, and see SETDA, The Broadband Imperative: Recommendations to Address K-12 Education Infrastructure Needs (2012), available at [http://www.setda.org/c/document\\_library/get\\_file?folderId=353&name=DLFE-1517.pdf](http://www.setda.org/c/document_library/get_file?folderId=353&name=DLFE-1517.pdf) ("SETDA Broadband Recommendations").

<sup>5</sup> Statement of Commissioner Ajit Pai <http://www.fcc.gov/article/doc-322284a4>.

robust and high-capacity next generation broadband infrastructure that will last for decades to come.<sup>6</sup>

In order to accomplish these goals, the League supports predictable and sufficient funding for all schools, and believes the Commission should create a capital investment fund to focus on the deployment of a robust network infrastructure that will withstand educational demands in the years to come. There is broad agreement among commenters that a capital investment in infrastructure is an efficient strategy to meet growing capacity demands.<sup>7</sup> In the FCC's record in this proceeding, we also found broad agreement among commenters for taking steps that would enable these efficiencies and investments including broad support among commenters for enabling schools to have more high speed broadband choices by equalizing the treatment of both lit and dark fiber within the E-rate program.<sup>8</sup>

As explained in our initial comments, we also support all strategies that promote efficiency, including simplifying the application process and creating electronic systems that enable transparency of information. More specifically, we support strategies and systems that will ensure the best service at the most affordable price.

Modernization of the E-Rate program is essential to fulfilling that congressional mandate by upgrading our schools' infrastructure from the current inadequate bandwidth to sufficient high-speed broadband in a timely, efficient manner. To modernize and expand the successful E-

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<sup>6</sup> SETDA at 17-18, Comments of the New America Foundation's Open Technology Institute, WC Docket No. 13-184 (Sept. 16, 2013), at 1, (OTI), SHLB Comments of the School Health Libraries for Broadband Coalition, WC Docket No. 13-184 (Sept. 16, 2013) at 2 (SHLB), DPLA at 1

<sup>7</sup> NATOA at 2, SHLB at 4-6, Comments of Imperial County Office of Education, WC Docket No. 13-184 (Sept. 16, 2013) at 9 (Imperial County), EducationSuperHighway at 9, ALA at 20-21

<sup>8</sup> ALA at 20-21, Boston at 4, California at 8, E-mpa at 7, Comments of E-rate Service Providers, WC Docket No. 13-184 (Sept. 16, 2013) at 8 (ESP), Comments of Houston Independent School District, WC Docket No. 13-184 (Sept. 16, 2013) at 2 (Houston), Comments of State of Hawaii, WC Docket No. 13-184 (Sept. 16, 2013) at 10 (Hawaii), Comments of Illinois Fiber Resources Group, WC Docket No. 13-184 (Sept. 16, 2013) at 5 (IFRG), OTI at 3,6-7, Comments of San Diego County Office of Education, WC Docket No. 13-184 (Sept. 16, 2013) at 5 (San Diego), SHLB at 6, Comments of Wisconsin Department of Public Instruction, WC Docket No. 13-184 (Sept. 16, 2013) at 5 (Wisconsin)

rate program, there is broad agreement that we need to: 1) focus the E-rate program on broadband connectivity and infrastructure to ensure that we maximize the impact of the E-rate on learning;<sup>9</sup> 2) enable infrastructure upgrades within the E-rate program, to connect every school to high-speed, future proof broadband technologies and every classroom to Wi-Fi;<sup>10</sup> and 3) reform the way the program is managed to reduce costs, improve efficiency and transparency, and ensure that all students have access to the connectivity they need.<sup>11</sup>

Thus, by taking the strategic steps outlined above to deploy high speed broadband to our schools and wi-fi to every classroom, we will be investing today to save money tomorrow. By making the one-time investment in future-proof technologies like fiber, we can help ensure that these investments make a difference not just for the next semester, but the next generation. And by modernizing and future-proofing the E-rate program, we can help empower all students to continually benefit from the latest technological innovations not just for the next few years, but for decades to come.

Across the country, the League districts are transforming teaching and learning by harnessing the power of modern digital technologies. The League is taking advantage of one-to-one learning technologies that can be as powerful as having a full time personal tutor, blended

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<sup>9</sup> See, e.g., Initial Comments by Alaska Dep't of Education & Early Development & Alaska State Library; Initial Comments by the California Dep't of Education; Utah Education Network Comments; Comments of CSM, Inc.; Bureau of Indian Affairs/Education Comments; Comments of New America Foundation's Open Technology Institute & Education Policy Program; Comments of the Leading Education by Advancing Digital ("LEAD") Commission; Comments of the Minority Media & Telecommunications Council, the Rainbow Push Coalition, and the League of United Latin American Citizens; Comments of Comcast Corp.; Comments of AT&T, Inc.; Comments of McGraw-Hill Education; Comments of General Communication Inc.; Comments of Windstream Corporation.

<sup>10</sup> See for example Education SuperHighway argument that enabling investment in fiber provides an opportunity to reduce long-term costs while building infrastructure that will permit schools and libraries to scale their bandwidth capacity over the next generation.

<sup>11</sup> See, e.g., Comments of LEAD Commission; Comments of the New York City Dep't of Education; Comments by Los Angeles Unified School District; Comments by the South Carolina K-12 School Technology Initiative; Comments of the Benton Foundation; Comments of ADTRAN, Inc.; Education Coalition Comments; Comments of the Massachusetts Dep't of Telecommunications & Cable; Comments of Merit Network, Inc.; Comments of the National Education Ass'n; Comments by Illinois Fiber Resources Group; Comments of the National Ass'n of State Utility Consumer Advocates.

learning models that can extend the reach of the classroom, immersive learning games as engaging as the best video games, two way video that can beam in experts from around the globe, cloud technologies that extend the reach of the possible, and “bring your own technology” programs to incentivize anytime, anywhere learning. These efforts, powered by broadband, are all resulting in advancements in student engagement and achievement. But we need to modernize and expand the E-rate program if we want to extend the reach of the possible, and enable every child to benefit from these high speed digital opportunities.

## **CONCLUSION**

The impressive number and diversity of commenters provides a solid record underscoring the League’s belief that the FCC has the opportunity – and the obligation – to help provide American schools with the speeds they need to open a new world of digital learning opportunities. We simply can’t prepare our kids to compete for 21st century jobs by leaving them stranded with 20th century technologies. Therefore, we ask you to support swift action to modernize the E-rate program to help bring transformative learning opportunities via high-speed connections to every K-12 school in America. This may be the most important education policy act of the decade and should set the US education system up for advancing high-speed digital learning opportunities far into the future.

Respectfully submitted,

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On Behalf of the Digital Promise League of Innovative Schools Superintendents:

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